

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

FILED
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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DESMOND LAMAR BROWN, JR.,

Defendant.

CASE NO.

JUDGE

INDICTMENT

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

THE GRAND JURY CHARGES:

COUNT 1

(False Statement During Purchase of a Firearm)

On or about June 30, 2022, in the Southern District of Ohio, the defendant, **DESMOND LAMAR BROWN, JR.**, in connection with the acquisition of a firearm, specifically, a Glock 19, 9mm pistol bearing serial number BTBZ911, from Vance Outdoors, 3723 Cleveland Avenue, Columbus, Ohio, a federally licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Vance Outdoors, which statement was intended and likely to deceive Vance Outdoors as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, and represented that he was

the actual transferee/buyer of the firearm, when in fact the defendant was acquiring the firearm on behalf of another person.

In violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

A TRUE BILL.

S/Foreperson

FOREPERSON

KENNETH L. PARKER
United States Attorney


KEVIN W. KELLEY (0042406)
Assistant U.S. Attorney